

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
v.) Criminal No. 04-10096-JLT
)
)
JUDY COLLYMORE)

JOINT STATUS REPORT

Pursuant to Local Rule 116.5(C), the parties are hereby jointly filing the following Status Report prepared in connection with the Interim Status Conference scheduled for July 6, 2004.

1. Outstanding Discovery Issues

There are no outstanding discovery issues.

2. Additional Discovery

The government will provide expert discovery 21 days before trial. The defendants will provide expert discovery 7 days before trial. No party presently anticipates producing or requesting any other additional discovery.

3. Insanity/ Public Authority Defenses

The defendant does not presently intend to raise a defense of insanity or public authority.

4. Notice of Alibi

The government requested a Notice of Alibi in its Automatic Discovery Letter. No response has been received to that request as of this date.

5. Motions

The defendant is requesting that the motion date for filing motions to dismiss, sever or suppress be extended until August 6, 2004. The defendant is reserving her right to file other pretrial motions that could require a ruling by the District Court. The government does not oppose this request.

6. Scheduling

The defendant is requesting that a further status conference be held in mid-August so that the defendant can pursue the possibility of a plea and make final determinations on the filing of motions. At the Final Status Conference, the parties will report to the court on the likelihood of a plea.

7. Early Case Resolution

See paragraph 6.

8. Speedy Trial Act Calculations

The parties have conferred on the periods excludable from all Speedy Trial Act calculations and agree that the following periods are excludable:

4/14/04-5/11/04 Excluded per order dated 4/14/04

5/12/04-5/24/04 12 day period counted

5/25-7/6/04 Excluded per order dated 5/26/04

7/6/04-Further Excluded by agreement
Status Conf.

As of the Further Status Conference, 12 days will have been

counted and 58 days will remain under the Speedy Trial Act.

9. Length of Trial

In the event that a trial is required, the parties estimate that it will last 3-4 days.

Respectfully submitted,

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